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May 3, 2007

BY E-FILE

The Honorable Gregory M. Sleet
United States District Court for the District of Delaware
U.S. Courthouse
844 North King Street
Wilmington, DE 19801

Re: *Monte-Carlo Country Club et al. v. ATP Tour, Inc., et al.*,
D. Del., C.A. No. 07-198-GMS;
Deutscher Tennis Bund, et al. v. ATP Tour, Inc., et al.,
D. Del., C.A. No. 07-178-GMS

Dear Judge Sleet:

This firm, along with Sidley Austin LLP, represents plaintiffs in the action entitled, *Monte-Carlo Country Club et al. v. ATP Tour, Inc., et al.*, D. Del., C.A. No. 07-198-GMS (the "*Monte Carlo* Action"). We write not only on behalf of the *Monte Carlo* plaintiffs but on behalf of all parties in the *Monte Carlo* Action as well as all parties in the related action assigned to Your Honor entitled, *Deutscher Tennis Bund, et al. v. ATP Tour, Inc., et al.*, C.A. 07-178-GMS (the "*Hamburg* Action"), to request a Rule 16 conference at the Court's earliest convenience to consider the [Proposed] Coordinated Scheduling Order (attached hereto). For the reasons stated below, the parties believe that the proposed order serves the interests of judicial economy and the particular circumstances of these related actions, and respectfully request that the Court use it as the basis for its controlling order for both cases.

Both the *Monte Carlo* and the *Hamburg* Actions concern a plan to alter certain aspects of the ATP men's professional tennis circuit beginning in 2009. The parties agree that, given the common aspects of the cases and the nature of the issues involved, it would serve the interests of judicial economy to have discovery and pretrial proceedings in these cases proceed in a coordinated fashion. The parties also agree that, if at all possible, trial should be scheduled in the first third of 2008. While that date is approximately twelve months from the date of the initiation of the two actions, the minimum time set forth in this Court's local rules, the disputes raised in

the complaints need to be resolved sufficiently in advance of the 2009 tennis season to enable the parties and other affected entities to prepare adequately for that season.

To meet these objectives, the parties have met and conferred, and were able to reach agreement on the terms of the enclosed [Proposed] Coordinated Scheduling Order. Should Your Honor have any questions, counsel are available at the Court's convenience.

Respectfully,



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PAR/mes/793149

Enc.

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